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January 16, 2004

Ms. Zenaida Tapawan-Conway California Public Utilities Commission Energy Division 505 Van Ness Avenue San Francisco, CA 94102-3298

Subject: Additional Materials in Support of ADM Proposal

for Mobile Energy Clinic Program in PG&E Service Territory,

Proposal Reference Number 1107-04

Dear Ms. Tapawan-Conway:

In its letter of January 7, 2004, the California Public Utilities Commission (CPUC) indicated that ADM's proposal for the Mobile Energy Clinic Program in PG&E's service territory had received a Primary Score of 70 and a Secondary Score of 68 and therefore remained eligible for funding consideration for the 2004-2005 program cycle. The CPUC also offered ADM the opportunity to submit additional materials in support of its proposal. This letter provides the additional support materials.

ADM's Mobile Energy Clinic Program has been selected for funding in the service territories of SCE, SCG and SDG&E, but CPUC staff recommended against funding the program in PG&E's service territory "because there are other better small business direct install programs selected in that area" and because of "limited amount of available PGC funds." We recognize that available PGC funding is an important consideration. However, we feel that the Mobile Energy Clinic has demonstrated its effectiveness over the past several years and provides energy efficiency services to customers who otherwise would not receive such services.

In particular, we have targeted the Mobile Energy Clinic Program for PG&E's service territory to provide energy efficiency services to small businesses located in the Central Valley, particularly the counties of Fresno, Kern, and Kings. Using data from *County Business Patterns: 2001*, we have estimated that there are over 7,100 retail and service businesses and eating and drinking places in these counties that are candidates for services through the Mobile Energy Clinic Program. (See Table 1.) In addition, there are small, office-type establishments that are also candidates for the energy efficiency



services we offer through the Mobile Energy Clinic. Thus, we expect over 7,500 businesses will be candidates for the services.

Table 1. Small Business Establishments in Targeted Area

Type of Establishment	Fresno	Kern	Kings	All
Automobile dealers	95	54	3	152
Other motor vehicle dealers	21	25		46
Automotive parts, accessories & tire stores	177	146	26	349
Furniture stores	64	45		109
Home furnishings stores	61	48		109
Electronics & appliance stores	96	73		169
Building material & supplies dealers	105	84	16	205
Lawn & garden equip & supplies stores	54	41	9	104
Grocery stores	266	193	32	491
Specialty food stores	67	52		119
Beer, wine & liquor stores	72	43		115
Health & personal care stores	131	98	14	243
Gasoline stations	235	191	33	459
Clothing stores	151	95	20	266
Shoe stores	51	43		94
Jewelry, luggage & leather goods stores	73	60		133
Sporting goods, hobby, musical instrument stores	75	58		133
Book, periodical & music stores	27	22		49
Department stores	-	0	0	-
Other general merchandise stores	31	27		58
Florists	43	33		76
Office supplies, stationery & gift stores	68	44		112
Used merchandise stores	25	30		55
Other miscellaneous store retailers	80	66		146
Traveler accommodation	54	74	16	144
RV parks & recreational camps		17		17
Fuill-service restaurants	335	241	41	617
Limited-service eating places	408	347	49	804
Special food services	34	21		55
Drinking places (alcoholic beverages)	82	74		156
Automotive repair & maintenance	473	317	44	834
Electronic & precision equipment R&M	38	22		60
Commercial equipment (exc auto & elec) R&M	55	67		122
Personal & household goods R&M	56	38		94
Personal care services	110	77		187
Death care services	30	25		55
Drycleaning & laundry services	73	63		136
Other personal services	50	36		86
Sum	3,866	2990	303	7,159

Moreover, these businesses are in a geographical area where climate conditions create high demand for air conditioning. The area we are targeting is primarily Climate Zone 13, as designated by the California Energy Commission. (See map in Attachment 1). As Table 2 shows, the annual cooling degree days for this climate zone are the highest in the state except for the desert areas of Climate Zone 15. Demand for electricity for cooling is therefore relatively high for businesses in this area. Thus, the air conditioning tune-up services that we provide through the Mobile Energy Clinic to small businesses in Fresno, Bakersfield, and other locales in these three counties will result in significant energy savings.

Table 2. Annual Cooling Degree Days for California Climate Zones (Base is 10° C)

Climate	CDD		
Zone	(Base 10C)		
1	887		
2	1,715		
3	1,555		
4	1,879		
5	1,586		
6	2,293		
7	2,506		
8	2,589		
9	2,742		
10	2,790		
11	2,446		
12	2,117		
13	2,965		
14	2,672		
15	4,750		
16	1,124		

Our review of other proposals that the CPUC selected for PGC funding indicates that the services that we propose to offer to small businesses in Fresno, Kern and Kings counties do not overlap with the services being offered in other proposals. For example, Richard Heath and Associates does offer a small nonresidential energy fitness program, but the geographical areas that they target do not include Fresno, Kern or Kings counties.

In sum, our proposed Mobile Energy Clinic Program for PG&E's service territory targets a deserving population in a geographical area that is not being targeted by other programs. Moreover, we have had demonstrated success in using the Mobile Energy Clinic Program to provide energy efficiency services to small, hard-to-reach commercial businesses.

Very truly yours,

Taghi Alereza Principal Attachment

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Attachment 1. California Climate Zones